



# ASL SERVICES HOLDINGS, LLC.

GLOBAL VRS  
3700 COMMERCE BOULEVARD  
KISSIMMEE, FLORIDA 34741

Via Overnight Delivery and Electronic Comment Filing Submission (ECFS) Received & Inspected

October 31, 2016

NOV 01 2016

Ms. Marlene H.  
Dortch Secretary  
Federal Communications  
Commission 445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

FCC Mailroom

DOCKET FILE COPY ORIGINAL

ATTN: Chief, Consumer and Governmental Affairs Bureau

RE: ASL Services Holdings, LLC Annual Compliance Report, Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123

Dear Secretary Dortch:

Pursuant to Section 64.606(g) of the Commission's rules, 47 C.F.R. §64.606(g), ASL Services Holdings, LLC dba GlobalVRS ("Global VRS") submits the attached *Annual Compliance Report* ("Report") and annual Customer Proprietary Network Information ("CPNI") compliance certification to the Commission. By this submission, GlobalVRS demonstrates and certifies its continued compliance with the Commission's Mandatory Minimum Standards ("MMS") for the provision of Telecommunications Relay Service Fund ("Fund") eligible Internet-based video relay services ("VRS") as set forth in Section 64.604 *et seq.* of the Commission's rules, 47 C.F.R. §§64.604 *et seq.* and CPNI regulations pursuant to Section 64.5101 *et seq.* of the Commission's rules, 47 C.F.R. §§64.5101 *et seq.*

GlobalVRS remains in compliance with the MMS, despite the increasing pressures of operating at a financial loss<sup>1</sup> while further meeting requirements associated with ongoing implementation of the Commission's Program reforms as a specialized video relay service ("VRS") provider. Further, the Company has successfully integrated and served Deaf-Blind subscribers, following the exit of Hancock Jahn Lee & Puckett, LLC as a video relay service provider earlier this year. GlobalVRS has continued to actively participate in regulatory proceedings, meetings with the Commission and Fund Administrator and worked with both consumer groups and competing providers to enhance the provision of video relay services.

<sup>1</sup> See, *Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123*, Emergency Petition for Extension of the Rate Relief Termination Date of ASL Services Holdings LLC dba Global VRS (August 12, 2016).

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Further, GlobalVRS has actively participated in Deaf Community outreach through the creation of English and Spanish language videos and participation in national Deaf events, several of which it has sponsored, among other initiatives. The Company continues to introduce technical engineering enhancements to its entire subscriber base and to improve its customers' experience.

**Request for Confidential Treatment. Request for Confidential Treatment.** Pursuant to Section 0.459 of the Commission's rules,<sup>2</sup> and "Exemption 4" of the Freedom of Information Act,<sup>3</sup> GlobalVRS respectfully requests that identified sections of its *Report* be deemed confidential and protected, accordingly.

This redacted sections of GlobalVRS' *Report* constitute "trade secrets" as set forth in Section 0.457 of the Commission's rules,<sup>4</sup> in that the information reveals specific strategic actions taken by the Company that would be useful to competitors. Further, redacted sections of the Company's *Report* contain highly confidential information not intended for public consumption. GlobalVRS would not otherwise make this information publically available under any circumstance. Release of this information the public could cause GlobalVRS irreparable and inestimable harm. GlobalVRS requests that the redacted sections be withheld from public inspection, accordingly. Should disclosure of the redacted sections be requested, GlobalVRS requests that it be informed of such request so that it may take appropriate action to safeguard its interests.

In support of its request and pursuant to Section 0.459(b) of the Commission's rules, GlobalVRS states as follows:

**1. Identification of the specific information for which confidential treatment is sought.**

GlobalVRS requests confidential treatment to the confidential data appearing at pages 1, 2, 4, and 6 of its *Report*.

**2. Identification of the circumstances giving rise to the submission.**

GlobalVRS is providing confidential information to demonstrate its mandatory minimum standard compliance.

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<sup>2</sup> 47 C.F.R §0.459.

<sup>3</sup> 47 C.F.R. §0.457(d). *See National Parks and Conservation Assn. v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974) ("National Parks"); Southern Company Request for Waiver of Section 90.629 of the Commission's Rules, 14 FCC Rcd. 1851, 1860 (1998).

<sup>4</sup> 47 C.F.R. §0.457.

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**3. Explanation of the degree to which the information is commercial or financial or contains trade secret or is privileged.**

The confidential information constitutes highly confidential operations information that could be useful to competing entities. This information is safeguarded from competitors and is not made to the public accordingly.

**4. Explanation of the degree to which the information concerns a service that is subject to competition**

The confidential information involves video relay services, a highly competitive service.

**5. Explanation of how disclosure of the information could result in competitive harm.**

Disclosure of confidential information could cause substantial competitive harm to GlobalVRS, because other video relay service providers would gain access to critical operations information and be able to assess the Company's relative size; information that would be useful in competing against GlobalVRS and undermine the Company's ability to compete.

**6. Identification of any measures taken to prevent unauthorized disclosure.**

GlobalVRS treats the redacted information as highly confidential and exercises significant care to ensure that such information is not disclosed to competitors, the public, or third parties.

**7. Identification of whether the information is available to the public and the extent to of any previous disclosures of information to third parties.**

GlobalVRS does not make the redacted information to the public or to third parties. Confidential information has been provided to the Commission.

**8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.**

This information is being submitted by GlobalVRS. GlobalVRS requests that the redacted information be treated as confidential indefinitely as the Company cannot identify a date certain by which this information could be disclosed without causing irreparable competitive harm to Global VRS.

In accordance with the Commission's May 31, 2012 *Second Protective Order* in the above-referenced proceeding, DA 12-858, an original and one (1) copy of this letter and attachment and two (2) redacted copies of this letter are enclosed. Two confidential copies of this letter have been sent via U.S. Mail to Mr. Eliot Greenwald, Consumer and Governmental Affairs Bureau, Federal Communications Commission, 445 12th Street, S.W., Room 3-B431, Washington, D.C. 20554.

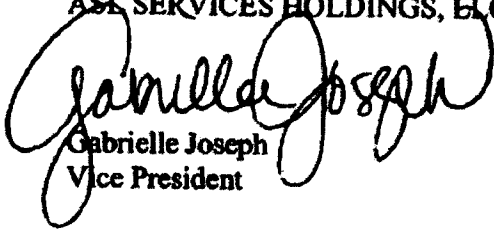
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Pursuant to the Commission Disability Rights Office's May 7, 2012 guidance for submission of reports required by the telecommunications relay service rules, a confidential version, and separate public version are being submitted electronically to [TRSreports@fcc.gov](mailto:TRSreports@fcc.gov). A public inspection copy has been filed with in the Commission's electronic comment filing system.

Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

ASL SERVICES HOLDINGS, LLC



Gabrielle Joseph  
Vice President

Attachments

cc: Ms. Karen Peltz Strauss (via electronic delivery, [Karen.Strauss@fcc.gov](mailto:Karen.Strauss@fcc.gov))  
[TRSreports@fcc.gov](mailto:TRSreports@fcc.gov)

## ASL Services Holdings, LLC dba GlobalVRS 2016 Annual Compliance Report

### I. INTRODUCTION

Pursuant to Section 64.606(g) of the Commission's rules, 47 C.F.R. §64.606(g), ASL Services Holdings, LLC dba GlobalVRS ("GlobalVRS") submits its initial *Annual Compliance Report* ("Report")<sup>3</sup> to the Commission. This Report demonstrates GlobalVRS' continued compliance with the Commission's Mandatory Minimum Standards ("MMS") for the provision of Internet-based video relay services ("VRS").

By its report, GlobalVRS demonstrates that the Company meets and/or exceeds the MMS for the provision of Telecommunications Relay Service Fund ("Fund") eligible VRS. In the past year, ASL has applied its unique trilingual, skill set<sup>4</sup> to interpret [REDACTED]. GlobalVRS has experienced a more than [REDACTED]percent growth rate in 2016 representing a fifth year of annual usage growth rate, while exceeding Commission speed of answer requirements.

In January 2016, a sixth call center was added to [REDACTED] to accommodate increased traffic.

Per Section 64.606(g)(1), the following verified Report updates compliance information, where applicable. Otherwise GlobalVRS certifies that there are no changes to the information and documentation submitted with its Application for certification.<sup>5</sup> A certification of the truthfulness, accuracy, and completeness of this Report by its Vice President, a GlobalVRS officer and minority owner, is attached pursuant to Section 64.606(g)(2).

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<sup>3</sup> Notice of Conditional Grant of Application of ASL Services Holdings, LLC for Certification as a Provider of Video Relay Service Eligible for Compensation from Interstate Telecommunications Relay Service Fund, CG Docket No. 10-51, Public Notice, DA 11-1902 (November 15, 2011).

<sup>4</sup> American Sign Language, Spanish, and English.

<sup>5</sup> See, e.g. In the Matter of Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123, Application Of ASL Services Holdings, LLC (September 6, 2011)(Supp. November 9, 2011)[“Application”].

## **II. SECTION 64.606(a)(2) UPDATE**

GlobalVRS provides the following updates to the information contained in the Company's Application, as cited, pursuant to Section 64.606(a)(2) of the Commission's rules, 47 C.F.R. §64.606(a)(2):

**(i) A description of the forms of Internet-based TRS to be provided (i.e., VRS, IP Relay, and/or IP captioned telephone relay service);**

There is no change in GlobalVRS's provision of VRS services as a conditional Fund eligible provider. In March GlobalVRS initiated the provision of VRS to Deaf-Blind subscribers following Hancock Jahn Lee & Puckett, LLC's ("CAAG") market exit, at the request of the Commission; Application page 8.

**(ii) A detailed description of how the applicant will meet all non-waived mandatory minimum standards applicable to each form of TRS offered, including documentary and other evidence, and in the case of VRS, such documentary and other evidence shall demonstrate that the applicant leases, licenses or has acquired its own facilities and operates such facilities associated with TRS call centers and employs communications assistants, on a full or part-time basis, to staff such call centers at the date of the application. Such evidence shall include, but not be limited to:**

**(A) In the case of VRS applicants or providers,**

**( 1 ) Operating five or fewer call centers within the United States, a copy of each deed or lease for each call center operated by the applicant within the United States;**

With the addition of the [REDACTED] call center in January 2016, the Company now operates six call centers; Application page 9, Exhibit A.

**( 2 ) Operating more than five call centers within the United States, a copy of each deed or lease for a representative sampling (taking into account size (by number of communications assistants) and location) of five call centers operated by the applicant within the United States, together with a list of all other call centers that they operate that includes the information required under §64.604(c)(5)(iii)(N)( 2 );**

Lease for the [REDACTED] call center added in 2016 is attached. GlobalVRS now operates these call centers: [REDACTED]. The information required under Section 64.604(c)(5)(iii)(N)( 2 ) for these call centers was submitted to the Commission in the Company's semi-annual call center report in October 2016 and remains current.

**( 3 ) Operating call centers outside of the United States, a copy of each deed or lease for each call center operated by the applicant outside of the United States;**

Inapplicable. GlobalVRS does not operate call centers outside of the U.S.; Application page 9.

**( 4 ) A description of the technology and equipment used to support their call center functions-including, but not limited to, automatic call distribution, routing, call setup, mapping, call features, billing for compensation from the TRS Fund, and registration-and for each core function of each call center for which the applicant must provide a copy of technology and equipment proofs of purchase, leases or license agreements in accordance with paragraphs (a)(2)(ii)(A)(5) through (7) of this section, a statement whether such technology and equipment is owned, leased or licensed (and from whom if leased or licensed);**

In 2016 the Company enhanced its IOS-based Mobile VRS application for English and Spanish. Further, the Company developed procedures for supporting new Deaf-Blind subscribers, including implementing software enhancements, and interpreter training. Application page 10, Exhibit B.

The Company is continued development of interfaces with the Telecommunications Relay Service – User Registration Database.

**( 5 ) Operating five or fewer call centers within the United States, a copy of each proof of purchase, lease or license agreement for all technology and equipment used to support their call center functions for each call center operated by the applicant within the United States;**

Inapplicable. *See* item (1), *Supra*.

**( 6 ) Operating more than five call centers within the United States, a copy of each proof of purchase, lease or license agreement for technology and equipment used to support their call center functions for a representative sampling (taking into account size (by number of communications assistants) and location) of five call centers operated by the applicant within the United States; a copy of each proof of purchase, lease or license agreement for technology and equipment used to support their call center functions for all call centers operated by the applicant within the United States must be retained by the applicant for three years from the date of the application, and submitted to the Commission upon request;**

The leases for call center added in 2016 is attached. Other call center leases have been provided to the Commission.

**( 7 ) Operating call centers outside of the United States, a copy of each proof of purchase, lease or license agreement for all technology and equipment used to support their call center functions for each call center operated by the applicant outside of the United States; and**

Inapplicable. *See* item (3), *Supra*.

**( 8 ) A complete copy of each lease or license agreement for automatic call distribution.**

No change; Application page 10, Exhibits B.

**(B) For all applicants, a list of individuals or entities that hold at least a 10 percent equity interest in the applicant, have the power to vote 10 percent or more of the securities of the applicant, or exercise de jure or de facto control over the applicant, a description of the applicant's organizational structure, and the names of its executives, officers, members of its board of directors, general partners (in the case of a partnership), and managing members (in the case of a limited liability company);**

No change; Application page 11.

**(C) For all applicants, a list of the number of applicant's full-time and part-time employees involved in TRS operations, including and divided by the following positions: executives and officers; video phone installers (in the case of VRS), communications assistants, and persons involved in marketing and sponsorship activities;**

The Company currently employs a total of [REDACTED] individuals including [REDACTED] managers, [REDACTED] active interpreters and [REDACTED] administrative employees who are directly responsible for the provision of VRS.

**(D) For all applicants, copies of employment agreements for all of the provider's employees directly involved in TRS operations, executives, and communications assistants, and a list of names of employees directly involved in TRS operations, need not be submitted with the application, but must be retained by the applicant for five years from the date of application, and submitted to the Commission upon request; and**

No change; Application page 12. GlobalVRS will provide the Commission with a copy of all employment agreements immediately upon request.

**(E) For all applicants, a list of all sponsorship arrangements relating to Internet-based TRS, including on that list a description of any associated written agreements; copies of all such arrangements and agreements must be retained by the applicant for three years from the date of the application, and submitted to the Commission upon request;**

No change; Application page 12.



**(iii) A description of the provider's complaint procedures; and**

The Company's annual Consumer Complaint Log Submission was filed on June 21, 2016. Application pages 12 and 13.

**(iv) A statement that the provider will file annual compliance reports demonstrating continued compliance with these rules.**

Please see attached certification.

**(v) The chief executive officer (CEO), chief financial officer (CFO), or other senior executive of an applicant for Internet-based TRS certification under this section with firsthand knowledge of the accuracy and completeness of the information provided, when submitting an application for certification under paragraph (a)(2) of this section, must certify as follows: I swear under penalty of perjury that I am (name and title), an officer of the above-named applicant, and that I have examined the foregoing submissions, and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.**

Please refer to attached certification.

**(vi) Assessment of Internet-Based Provider Certification Application (47 C.F.R. §64.606(a)(3))**

GlobalVRS participated in various audits from 2014. To date, there are no outstanding findings from previous audits. No audits were conducted in 2016. GlobalVRS will continue to fully cooperate with any scheduled audits from the Commission.

**(vii) Substantive Changes (47 C.F.R. §64.606(f)(2))**

No substantive change notices were necessary in 2016.

**(viii) Substantive Changes (47 C.F.R. §64.606(f)(2))**

No service interruptions have been reported in 2016. GlobalVRS successfully maintained service during a Puerto-Rico wide power outage in September 2016 and during Hurricane Mathew in October 2016.

### **III. GLOBALVRS COMPLIANCE WITH SECTION 64.604, MANDATORY MINIMUM STANDARDS.**

Company continues to meet MMS for the provision of VRS, and hereby provides the following compliance updates to its Application, which it incorporates herein by reference as otherwise unchanged.

#### **A. Operational Standards.**

##### **1. Communications Assistant (“CA”) – Training (47 C.F.R. §64.604(a)(1)) and 64.606(g)(3)(ii).**

All employees, including Certified Interpreters, are required to complete an evaluation process and encouraged to engage in ongoing professional development. An internal Code of Professional Conduct test is also mandatory for each employee to successfully pass in order to maintain employment.

##### **2. Communications Assistant – Confidentiality and conversation content. (47 C.F.R. §64.604(a)(2))**

See discussion regarding CPNI regulation compliance, *Infra*.

##### **4. Handling of emergency calls. (47 C.F.R. §64.604(a)(4)) and amended Section 64.605.**

No change. Application page 23.

#### **B. Technical Standards**

##### **2. Speed of Answer. (47 C.F.R. §64.604(b)(2)(iii)).**

GlobalVRS’s speed of answering is for the 12 month period ending October 31, 2016 is [REDACTED] percent of calls answered within 120 seconds or less, well above the established standard. At no time during this period did the Company’s percentage of calls answered within 120 seconds drop below [REDACTED] percent.

##### **5. Technology. (47 C.F.R. §64.604(b)(5)).**

The Company continues to pursue enhancements to its wireless applications and call distribution platform to make them more user friendly and improve user accessibility, while meeting Commission TRS Program reform obligations.

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<sup>8</sup> Health Insurance Portability and Accountability Act of 1996.

**C. Functional Standards**

**2. Contact Persons. (47 C.F.R. §§64.604(c)(2)) and 64.606(g)(3)(i))**

The senior individual responsible to receive complaints, grievances, inquiries, and suggestions for GlobalVRS and officers responsible for compliance with section 64.604(c)(13) are as follows.

Representatives:

Gabrielle Joseph

ASL Services Holdings, LLC/GraciasVRS

3700 Commerce Blvd.

Kissimmee, Florida 34741

Phone: 888-472-6768 (Spanish VRS)

888-472-6778 (English VRS)

E-Mail: Gabrielle@aslservices.com

Website: www.GlobalVRS.com

Facsimile: 407.518.7903

Voice Telephone: 1.877.DAME.VRS ( 1.877.326-3877)

English and Spanish VP Users: Globalvrs.tv

**3. Public Access to Information. (47 C.F.R. §64.604(c)(3)).**

GlobalVRS continues to expanded its outreach efforts in educating the public and stakeholders about trilingual (English, Spanish, American Sign Language) VRS Services. The Company has also supported Deaf-Blind community with added information and capabilities following its assumption of Deaf-Blind subscribers in early 2016.

**6. Data Collection and Audits from TRS Providers (47 C.F.R. §64.604(c)(5)(iii)(D))**

GlobalVRS has timely submitted all data to the TRS Fund Administrator and appointed auditors.

**Whistleblower protections (47 C.F.R. 64.604(c)(5)(iii)(M))**

GlobalVRS addresses Whistleblower protection requirements as part of its initial employee orientation and incorporated into more formalized training program.

**IV. COMPLIANCE WITH SECTION 64.606(g)(3)**

**1. Identification of any officer(s) or managerial employee(s) responsible for ensuring compliance with §64.604(c)(13) of this subpart; (47 C.F.R. §64.606(g)(3)(i))**

Please refer to Section III.C.2. at page 8, *supra*.

**2. A description of any compliance training provided to the provider's officers, employees, and contractors; (47 C.F.R. §64.606(g)(3)(ii))**

GlobalVRS has engaged in ongoing compliance training with employees through employee manual enhancements and development of specific training materials, including CPNI compliance materials. The Company frequently addresses compliance issues with employees to deepen their understanding of specific regulatory requirements.

**3. Identification of any telephone numbers, Web site addresses, or other mechanisms available to employees for reporting abuses; (47 C.F.R. §64.606(g)(3)(iii))**

Please refer to Section III.C.2. at page 6, *supra*. In addition to contacting Company officers, an FCC Updates page is contained in the Company's web site, <http://globalvrs.com/globalvrs-fcc-updates/the-fcc-needs-you/>. This page contains hyperlinks to various Commission links in English and Spanish. Additionally, employees are advised that they may also contact the Commission directly:

Federal Communications Commission  
Consumer and Government Affairs Bureau  
Consumer Inquiries and Complaints Division  
445 12th Street  
Washington DC 2055  
VOICE: 1-888-CALL-FCC  
TTY: 1-888-TELL-FCC  
[www.fcc.gov/complaints](http://www.fcc.gov/complaints)

- 4 A description of any internal audit processes used to ensure the accuracy and completeness of minutes submitted to the TRS Fund administrator; (47 C.F.R. §64.606(g)(3)(iv))**

All usage reporting is automated through the Company's platform. There is no capability for manual access to reported data.

GlobalVRS' continues to use the reporting built in the existing platform that has been programed to prepare a "Daily FCC Report." This report lists call detail record, speed of answer and verified conversation minutes from the previous day. These data populate the Daily Administration Report (DAR) which contains all the statistical data reported to the Fund Administrator. The "Daily FCC Report" is statistically sampled by the Company and cross-referenced to the interpreters' manual log sheets to ensure accuracy. Company and also review any reports/updates/events/feedback form our Administrative Team. A Monthly Verification Report (MVR) is created to audits the results of the DAR report analysis to verify the final monthly reports and ensure accuracy of the monthly Fund Administrator submissions.

- 5 A description of all policies and practices that the provider is following to prevent waste, fraud, and abuse of the TRS Fund. A provider that fails to file a compliance plan shall not be entitled to compensation for the provision of VRS during the period of noncompliance. (47 C.F.R. §64.606(g)(3)(v))**

GlobalVRS has implemented an extensive screening process to ensure service quality.

A Whistleblower Policy is incorporated into the Company's employee handbook. This policy encourages employees to immediately report any illegal activity directly to the Commission and advise senior management. Employees receive training on applicable Commission regulations.

GlobalVRS has maintained quarterly meetings where employees are briefed on Commission regulations and industry activity. A copy of the Commission's Mandatory Minimum Standards and other attendant regulations are available in each video interpreter cubical as a reference. This not only ensures that video interpreters are familiar with Commission requirements but underscores the Company's stringent compliance commitment.

The Company has established a regulatory framework to assess Company compliance with the entirety of applicable Commission rules to identify areas of improvement.

GlobalVRS continues to update its technical practices to prevent waste, fraud, and abuse. The Company's platform automatically screens out any non-U.S. Internet Protocol addresses or unregistered TDN. In 2013, the Company implemented a platform function that requires video interpreters to affirmatively authenticate the validity of each call at the end of the call and identify the call as BILLABLE or NON-BILLABLE. This affirmative authentication provides another layer of fundamental decision making and empowerment to the Company's video interpreters to report any call they feel would be non-compensable or breaking any form of FCC regulation.

**§ 64.604 Mandatory minimum standards.**

(d) Other standards—The applicable requirements of sections 64.605, 64.611, 64.615, 64.617 (Neutral Video Communications Service Platform – Inapplicable to ASL), 64.621, 64.631, 64.632, 64.5105, 64.5107, 64.5108, 64.5109 and 64.5110 of this part are to be considered mandatory minimum standards.

In addition to the foregoing, GlobalVRS has been actively developing procedures and technological applications to comply with the following new MMS requirements:

**Section 64.611 Internet-based TRS registration.**

**Section 64.615 TRS User Registration Database and administrator.**

GlobalVRS continues to expend considerable resources in the redesign of an online registration system that captures all necessary subscriber information, while providing detailed information to subscribers including CPNI and the Electronic Signatures Act disclosures in written and video formats to ensure subscriber understanding and to ensure full compliance with Commission rules. The Company is testing its new registration process and is prepare to deploy the registration process with deployment of the new TRS-User Registration Database.

**Section 64.621. Interoperability and portability.**

At its own expense, GlobalVRS has participated in numerous industry meetings and initiated engineering changes to its systems to ensure that it's platform remains fully interoperable. GlobalVRS was an active participant in development of the SIP interoperability guidelines that the Commission is adopting.

**Section 64.631 Verification of orders for change of default TRS providers.**

**Section 64.632 Letter of authorization form and content.**

GlobalVRS has designed a Letter of Authorization in anticipation of final adoption of the account verification regulations. The letter mirrors those used in the wireline telecommunications industry. Additional clarification regarding information to be obtained from commercial subscribers remains pending Commission determination.

**CPNI Requirements for Relay Service Providers. Section 64.5101 *et seq.***

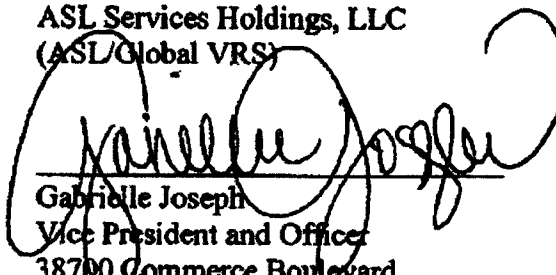
GlobalVRS has implemented a privacy policy for subscribers and additional disclosures in anticipation of full implementation of the CPNI regulations. Further, the Company has designed a CPNI training program, updated its employee manual, and instituted procedures for periodic interpreter CPNI reviews and new employee training. The Company has also expanded its data retention and data storage procedures and included a new security incident reporting and breach notification procedure to establish further guidance to employees.

Pursuant to Section 64.5109(e), attached hereto is GlobalVRS' initial CPNI compliance certification. Although initial submission of annual compliance certifications remains pending Office of Management and Budget approval of pending regulations including Section 64.5109,

GlobalVRS voluntarily complies as a reflection of its CPNI compliance.

**V. CONCLUSION**

As demonstrated herein, ASL continues to meet the MMS and additional requirements for the provision of Fund-eligible VRS.

ASL Services Holdings, LLC  
(ASL Global VRS)  
By:   
Gabrielle Joseph  
Vice President and Officer  
38700 Commerce Boulevard  
Suite 216  
Kissimmee, Florida 34741  
Telephone: 407.518.7900 ext. 201

[Call Center Lease Excluded from the Public Inspection Copy]

STATE OF FLORIDA )  
 ) ss.  
COUNTY OF OSCEOLA )

I, Gabrielle Joseph, swear under penalty of perjury that I am a Vice President and an Officer of ASL Service Holdings, LLC dba GlobalVRS, the reporting entity, and that I have personally examined the forgoing submission, and that all information required under the Commission's rules and orders have been provided and that all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.

**By:**

**Gabrielle Joseph**  
Vice President and Officer  
38700 Commerce Boulevard  
Suite 216  
Kissimmee, Florida 34741  
Telephone: 407.518.7900

Subscribed and Sworn to me this 31 day of October, 2016

**Notary Public**

My Commission expires OCT. 10, 2020

**SEAL**

**Kathleen A. Dolean**  
**NOTARY PUBLIC**  
**STATE OF FLORIDA**  
**Comm# 00029327**  
**Expires 10/10/2020**